

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

**LEQUIP IMPORTAÇÃO E  
EXPORTAÇÃO DE MÁQUINAS E  
EQUIPAMENTOS LIMITADA**

*Plaintiff*

**VERSUS**

**DRILLERS MUD SYSTEMS, L.L.C.**

*Defendant*

**CIVIL ACTION**

**SUIT NO.: 6:13-cv-00369**

**JUDGE REBECCA F. DOHERTY**

**MAGISTRATE JUDGE PATRICK J. HANNA**

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**MOTION TO COMPEL DISCOVERY**

Plaintiff, Lequip Importação e Exportação de Máquinas e Equipamentos Limitada (“Lequip”), moves this Court for an order compelling defendant Drillers Mud Systems, L.L.C. (“Drillers Mud”) to respond adequately to Lequip’s first and second sets of written discovery requests, described more thoroughly in Lequip’s supporting memorandum. Despite its promises to do so, Drillers Mud has failed either to respond adequately or to respond at all to a significant number of Lequip’s discovery requests.

Lequip’s supporting memorandum explains why the Court should order Drillers Mud to respond to Lequip’s discovery requests and why the Court should award Lequip reasonable attorneys’ fees in connection with this motion.

As required by Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37.1, counsel for Lequip has on several occasions conferred in person and by telephone and has corresponded with counsel for Drillers Mud in an attempt to resolve this discovery dispute and obtain the requested responses, to no avail.

Respectfully submitted,

/s/ David P. Borghardt

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*Counsel for Lequip Importação e  
Exportação de Máquinas e Equipamentos  
Limitada*

**CERTIFICATE OF SERVICE AND  
COMPLIANCE WITH RULE 37.1**

I hereby certify that, pursuant to Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37.1, counsel for Lequip has conferred with Clay LeJeune, counsel for Drillers Mud, in an attempt to reach an amicable resolution of this discovery dispute. Despite these efforts, counsel for Lequip and Drillers Mud were not able to resolve the dispute.

I further certify that on this day, a true and correct copy of the foregoing pleading was filed electronically using the CM/ECF system. Notice of this filing will be sent to all known counsel by operation of the court's electronic filing system. I also certify that I have mailed a copy of this filing to any non-CM/ECF participants by U.S. Mail, postage prepaid and properly addressed.

Baton Rouge, Louisiana, this 27th day of January, 2014.

*s/ David P. Borghardt*

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David P. Borghardt